REMARKS

Reconsideration and allowance are respectfully requested. Claims 7 and 11 have been amended to corrected informalities therein. Claims 1-16 are pending. In no way has any claim been amended to distinguish from prior art of record; rather, the amendments are purely cosmetic in nature and do not affect claim scope.

Claims 1-16 stand rejected under 35 U.S.C. 102(e) as being anticipated by Dodrill. The Examiner cited claims 1-2, 4-17 and 19-22 as being rejected, but Applicant interprets this as an error since there are only 16 claims. In any event, this rejection is respectfully traversed.

The claims specify an arrangement that enables an application server to call a second party on behalf of a caller (user), to call back the caller when the second party is available, and to bridge the calls connecting the second party and the caller so that the caller need not wait on hold in order to speak with the second party.

Each of claims 1, 6, 11, 14 and 16 defines a <u>user and a second party</u>. A first hypertext markup language (HTML) document is generated, based on the retrieved XML document, and has instructions including the call number for accessing the second party. A second HTML document is selectively generated, <u>based on a prescribed input received from the second party</u>, and has instructions for <u>connecting</u> the second party with the user.

Dodrill does not disclose <u>bridging</u> a call between a <u>user and a second party</u> using HTML and XML documents, let alone a second party or call number as claimed. Rather, Dodrill discloses interactions between a user and an <u>application server</u>.

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Nowhere does Dodrill disclose generating a first HTML document having instructions including the call number for accessing the second party.

In addition, Dodrill does not disclose generating a second HTML document based on a prescribed input received from a second party that has instructions for connecting the second party with the user. The Examiner cites Dodrill column 4, lines 48-64 and column 11, lines 58-61 as teaching this claimed feature. However, Dodrill describes a user supplying application parameters to an application server to define voice application operations for the user: the application server then generates an a user interface form 130 that enables the user to validate the application parameters (specified in the development form 102) by simultaneously displaying the two forms 102 and 130 (see column 11 line 62 to column 12, line 12 of Dodrill). There is no disclosure that the form 102 or 130 includes an instruction for connecting a second party (see, e.g., Figs, 5A and 5B of Dodrill).

Hence, the rejection should be withdrawn because it fails to demonstrate that Dodrill discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." Studiengesellschaft Kohle mbH v. Dart Industries, Inc., 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).
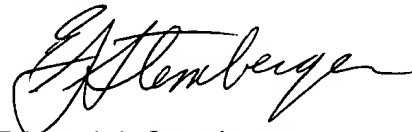
Each of claims 2-5, 7-10, 12, 13, and 15 depends from an independent claim. These claims are considered to be allowable for the reasons advanced above, and for the additional reason that the added subject matter thereof is neither taught nor suggested by the prior art of record.

All objections and rejections having been addressed, It is submitted that all pending claims are now in condition for allowance and a Notice to that effect is earnestly solicited.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-426, and please credit any excess fees to such deposit account.

Respectfully submitted,

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